

**EPA REGISTRATION NUMBER 7687-1 Vol 2**

# Material Sent for Data Extraction

Reg. # 7687-1

Description: AMENDMENT

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 4/18/2013

☐ Notification Dated \_\_\_\_\_

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☒ Decision #: A75657

☐ Other Action/Comments: \_\_\_\_\_  
\_\_\_\_\_

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: KAITLIN KELLER

Phone: 308-8172 Division: RD

Date: 4/19/2013



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, DC 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Forest Hampton III  
HCC Holdings, Inc.  
4700 West 160<sup>th</sup> Street  
Cleveland, OH 44135

APR 18 2013

Subject: Hercules BreakThru R-D Root Destroyer  
EPA Reg. No. 7687-1  
Amendment dated 2/4/2013 to modify "Directions for Use" and company  
name/address  
EPA Decision No. 475657

Dear Mr. Hampton,

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended, to modify the "Directions for Use" and company name and address, is acceptable. A copy of the approved label, stamped "Accepted" is enclosed.

If you have any questions, please contact Kaitlin Keller by phone at (703)-308-8172 or via email at [keller.kaitlin@epa.gov](mailto:keller.kaitlin@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Tony Kish", is written over the word "Sincerely,".

Tony Kish  
Product Manager 22  
Fungicide Branch  
Registration Division (7504P)

Enclosure: Label stamped "Accepted"

DRAFT LABEL

**FRONT PANEL:**

20602 Net Wt. 2 lbs. 907g

HERCULES BREAKTHRU R-D Root Destroyer

- Prevents and Clears Root-Blocked Sewer Lines
- Effective Slow Dissolving Crystals

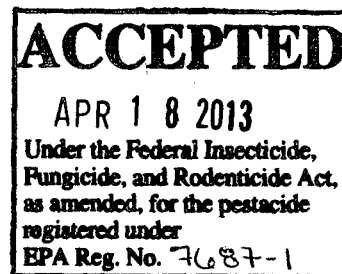
Active Ingredient: Copper Sulfate Pentahydrate

(CAS No. 7758-99-8) .....99.0%

Other Ingredients .....1.0%

Total .....100.0%

(Copper as metallic 25.2%)



**DANGER/PELIGRO:**

KEEP OUT OF REACH OF CHILDREN: SI USTED NO ENTIENDE LA ETIQUETA, BUSQUE A ALGUIEN PARA QUE SE LA EXPLIQUE A USTED EN DETALLE. (IF YOU DO NOT UNDERSTAND THE LABEL, FIND SOMEONE TO EXPLAIN IT TO YOU IN DETAIL.) READ ENTIRE LABEL BEFORE USING. SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT.

**PRECAUTIONARY STATEMENTS:**

**Hazards to Humans and Animals**

**DANGER/PELIGRO:** Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes, on skin or clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

**FIRST AID/EMERGENCY: CALL 1-877-740-5015 FOR INSTRUCTIONS. Have product container or label when calling a poison control center or doctor for treatment advice, if possible.**

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsions may be needed.

**IF IN EYES:** Rinse hands thoroughly before touching eyes. Hold eyes open and rinse slowly and gently with water for 15-20 minutes. After the first five minutes, remove contact lenses if present and easy to do, and continue rinsing. Call poison control center or doctor for treatment advice. **IF SWALLOWED:** Immediately call a poison control center or doctor for treatment advice. A person should sip a glass of water if able to swallow. Do not induce vomiting unless directed to do so by a poison control center or doctor. Do not give anything by mouth to unconscious person. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or a doctor for treatment advice. **IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

## BACK PANEL 1:

### GUARANTEE

HCC Holdings, Inc guarantees the purchaser that product will perform as stated when used according to directions, or purchase price will be refunded by HCC Holding, Inc upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.

HERCULES BREAKTHRU R-D Root Destroyer

Read entire labels before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 779-NY-1

**INTENDED USES:** Hercules Breakthru R-D Root Destroyer is a concentrated compound formulated for root control in sewer lines. It can also be used in lines leading to cesspools and septic tanks when used as directed.

**PROHIBITED USES:** It is a violation of federal law to use this product in a manner inconsistent with this labeling. This product may not be sold or used in Connecticut or the San Francisco Bay Area. Use the Hercules BreakThru Root Force™ product instead. Never pour product into sinks or tub drains.

**HOW IT WORKS:** When used as prescribed in DIRECTIONS, its slow dissolving crystals release a chemical treatment which, over several days, is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the involved tree or shrub. The portion of the roots destroyed will not re-enter the sewer or the drain.

### DIRECTIONS FOR USE:

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL.**

**PRE-APPLICATION PRECAUTIONS:** DO NOT APPLY THIS PRODUCT IN A WAY THAT WILL CONTACT ADULTS, CHILDREN, OR PETS, EITHER DIRECTLY OR THROUGH DRIFT. DO NOT ALLOW ADULTS, CHILDREN, OR PETS TO ENTER THE TREATED AREA UNTIL DUSTS HAVE SETTLED.

### APPLICATIONS:

**FIRST:** Put on goggles or face shield.

**TO OPEN:** Pry off cap with tool or coin, keeping face away from cap area, which may instantaneously discharge harmful dusts-vapors.

**TO CLEAR PARTIAL STOPPAGES: WHEN TO APPLY:** For product to be most effective, plan application late in evening after retiring or when there will be minimal water usage. This allows maximum initial chemical contact time with infiltrated roots and avoids wasting the product chemicals by over-diluting and flushing them out. **Toilet Option:** Use a total of 2 pounds (0.5 lbs metallic copper) in a single application as follows: Pour ½ lb of product into toilet bowl nearest where sewer line exits to outside. Then flush to be sure all crystals are carried into exterior sewer line. Repeat this three times for the total allowed maximum application of 2 pounds of product (0.5 lbs metallic copper). Never pour product into sinks or tub drains. **Sewer Drain Option:** Remove sewer clean out plug nearest where sewer line exits to outside. Then pour entire 2 lb. application of product directly into sewer line. Disperse into sewer line using a toilet flush or large water bucket. Reduce water usage for best effectiveness. The maximum application rate is 0.5 lbs metallic copper per application. The minimum retreatment interval is 6 months for toilets or sewer drain applications.

**TO CLEAR COMPLETE STOPPAGE:** First, some flow must be restored thru sewer using a snake or sewer rod to enable dissolved product to travel to the root clogged portions of sewer. Then use 2 lb. treatment method described above. Allow several days to two weeks for infiltrated roots to absorb the dissolved chemical, die, decay, and wash away.

**TO PREVENT ROOT STOPPAGES:** Toilet Bowl/Sewer Drain: Use 2 pounds (0.5 lb metallic copper) of product twice a year using "Partial Stoppages" method above. In Sewer Mains: Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage. In Storm Drains: Do not apply product during periods of heavy storm flow. When dry, introduce controlled flow with a hose using same 2 lb. dose as for "Sewer Drain". Clean-Up: Wash with soap and water after handling. Remove and wash clothing before reuse.

**STORAGE AND DISPOSAL:**

Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** Pesticide wastes may be hazardous. Improper disposal of excess pesticide is a violation of Federal Law. If this waste cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, Or Hazardous Waste Representative at the nearest EPA Regional Office for guidance. If partially filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by the label.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Then offer for recycling, if available or puncture and dispose of in a sanitary landfill.

**IN CASE OF SPILL:** Sweep up into dustpan and then refer to Pesticide Disposal section above.

**BACK PANEL 2:**

**HERCULES BREAKTHRU R-D Root Destroyer**

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

This product may not be sold or used in Connecticut or San Francisco Bay Area. Use new Hercules BreakThru Root Force™ instead.

HCC HOLDINGS, INC. An Oatey Affiliate • 4700 West 160th Street • Cleveland, Ohio 44135  
800-321-9532 • [www.herchem.com](http://www.herchem.com)

## Keller, Kaitlin

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**From:** Forest Hampton [FHampton@oatey.com]  
**Sent:** Thursday, April 18, 2013 8:56 AM  
**To:** Keller, Kaitlin  
**Subject:** RE: 7687-1 Hercules BreakThru R-D Root Destroyer updated label  
**Attachments:** DRAFT LABEL 7687-1 Hercules BreakThru R-D ROOT DESTROYER #4.pdf

Kaitlin,

I have been traveling, sorry for the delay in response. Here is the updated label. I made most of the changes. I updated the product name on the first page and replaced all of the R-D's with product. I left the full name on the top of both side panels because that is the way it will appear on the finished container. I corrected Root Force's name. I currently have a project updating that label with the EPA. Hercules had the name different on every application. I made it consistent to match the label. The correct name is Hercules BreakThru Root Force and it will be on the new label. If this is still a problem let me know.

Thanks,  
Forest Hampton III  
Product Stewardship Manager  
Oatey Co.  
ph: (216) 267-7100 x7540

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**From:** Keller, Kaitlin [<mailto:Keller.Kaitlin@epa.gov>]  
**Sent:** Wednesday, April 10, 2013 10:50 AM  
**To:** Forest Hampton  
**Subject:** RE: 7687-1 Hercules BreakThru R-D Root Destroyer updated label

Hi Forest,

A few more comments from the Product Manager, Tony Kish, in the attachment.

Thanks,  
Kaitlin

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**From:** Forest Hampton [<mailto:FHampton@oatey.com>]  
**Sent:** Monday, April 08, 2013 1:53 PM  
**To:** Keller, Kaitlin  
**Subject:** RE: 7687-1 Hercules BreakThru R-D Root Destroyer updated label

Kaitlin,

Here are the revisions.

Thanks,  
Forest Hampton III  
Product Stewardship Manager  
Oatey Co.  
ph: (216) 267-7100 x7540

**From:** Keller, Kaitlin [<mailto:Keller.Kaitlin@epa.gov>]  
**Sent:** Monday, April 08, 2013 1:25 PM  
**To:** Forest Hampton  
**Subject:** RE: 7687-1 Hercules BreakThru R-D Root Destroyer updated label

Thank you Forest. The pesticide disposal and in case of spill statements are still inconsistent though. The disposal statement should also include "If partially filled: call your local solid waste agency for disposal instructions. Never placed unused product down any indoor or outdoor drain except as specified by the label." The in case of spill language should state to sweep into dustpan and then refer to the disposal section. Please let me know if you have any questions about these changes.

Thanks,  
Kaitlin

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Kaitlin Keller  
Fellow, Fungicide Branch  
Registration Division  
USEPA Office of Pesticide Programs  
Phone: (703) 308-8172

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**From:** Forest Hampton [<mailto:FHampton@oatey.com>]  
**Sent:** Monday, April 08, 2013 9:26 AM  
**To:** Keller, Kaitlin  
**Subject:** 7687-1 Hercules BreakThru R-D Root Destroyer updated label

Kaitlin,

Attached are the revisions to 7687-1 Hercules BreakThru R-D Root Destroyer label that we discussed on the phone. I moved the First Aide section to the first page and placed it in a box. I updated the language, placed in a box and moved to the end of the Direction For Use section for the Storage and Disposal section based on Chapter 13 of the Label Review Manual. Let me know if I need to make any other changes.

Thanks,  
Forest Hampton III  
Product Stewardship Manager  
Oatey Co.  
ph: (216) 267-7100 x7540



# Explore Registrations

Reg Number: 7687-1 Reg Type: Product Registration - Section 3 Status: Registered (03-Jul-1962)  
 Name: HERCULES BREAKTHRU R-D ROOT DESTROYER <View Registration Details>

## (No New Receipts)

S	Submission Type	OPP Rec'd Date	Resubmission	Description
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- ...Decisions...
- D: Pending; 475657; 7687-1;300;LABEL REVISIO
- 75-Day Letters
- S: 931300 2/20/2013; Amendment; 7687
- D: Closed; 387534; 7687-1;676;Product Reregisi
- D: Closed; 378586; 7687-1;332;NOTIFICATION;
- D: Closed; 351330; 7687-1;300;LABEL REVISIO.
- D: Closed; 126232; 7687-1;300;LABEL REVISIO.
- D: Closed; 126231; 7687-1;385;SPECIAL PACKA
- Data Requirements

S: 931300 Reg #: 7687-1

Submission Type: Amendment

Resubmission?: ☐ Yes ☒ No

E-Sub #:

Decision #: 475657; 300;LABEL REVISION;NO DATA REQUIRED;

Submitter Company: HCC HOLDINGS INC.

Application Date: 14-Feb-2013

OPP Received Date: 20-Feb-2013

Date Sent to Risk manager: 21-Feb-2013

Studies Included?: ☐ Yes ☒ No

Fast Track?: ☒ Yes ☐ No

Form A Signed?: ☐ Yes ☐ No ☒ None

Date:

Form B Signed?: ☐ Yes ☐ No ☒ None

Date:

Reviewer: Keller, Kaitlin

Received DT:

Editable Due DT:

Submission Due DT: 21-May-2013

Response: 0, 20-Feb-2013

Priority Weight:

Priority Points:

Comments: Amending label/ new co name/ address/ lay out/ modified language in Directions for use

FEB 27 2013

# Receipt for Section 3

S: 931300

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Print Letter

Enter More Information

Tracking

Company: 7687 HCC HOLDINGS INC.

V

Risk Manager: Registration Division, Risk Management Team 22

Product #: 7687-1 Product Name: HERCULES BREAKTHRU R-D ROOT DESTROY

Override#:

Me Too

Me Too

Section3:

Product Name:

Application Date: 14-Feb-2013



OPP Rec'd Date: 20-Feb-2013



Front End Date: 20-Feb-2013



Risk Manager Send Date: 21-Feb-2013



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

AMENDMENT

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

Paper Label

Electronic Label

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 21, 2013

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

MS. DIANE ARTMAN  
HCC HOLDINGS INC.  
4700 WEST 160TH STREET  
CLEVELAND, OH 44135-

PRODUCT NAME: HERCULES BREAKTHRU R-D ROOT DESTROYER  
COMPANY NAME: HCC HOLDINGS INC.  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 7687-1  
EPA RECEIPT DATE: 02/20/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 22, at (703) 308-9443.

Sincerely,

A handwritten signature in black ink, appearing to be "Seyo", is written over the typed name.

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division



# FAST-TRACK AMENDMENTS – Completeness Screening Checklist

Expert's In-Processing Signature: Ackable Date: 2/25/13 PM #: 22

EPA Reg. Number: <u>7687-1</u>		EPA Receipt Date: <u>2/20/13</u>		
	Checklist Item	Yes	No	N/A
1	<b>Application Form</b> (EPA Form 8570-1) - signed?	✓		
2	<b>Confidential Statement of Formula</b> (EPA Form 8570-29) - signed?			✓
3	<b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) - signed?			✓
4	<b>Formulator's Exemption Statement</b> (EPA Form 8570-27) - signed?			✓
5	<b>Data Matrix</b> (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?			✓
	a) Selective Method?			
	b) Cite-All Method?			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	<b>Is Label included?</b> (5 copies)	✓		
	a) Electronic Label submitted?	✓		
<b>Comments:</b> <u>Box 6 incorrect - citing own product</u>				

# Fee for Service

{931300Y~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_\_

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

22

Receipt No.

S-

931300

EPA File Symbol/Reg. No.

7687-1

Pin-Punch Date:

2/20/2013

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_\_

## Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: [Signature]

Date: 2/21/13

Remarks:

## PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

**PAPERWORK REDUCTION ACT NOTICE:** Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to **Director, Collection Strategies Division (2822T) U.S. Environmental Protection Agency, 1200 Pennsylvania Ave, NW, Washington, DC 20460.**

**INSTRUCTIONS:** This form is to be used all applications for new registration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-34). [If not exempted by 40 CFR 152.81(b)(4)].
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Data Matrix.

**Submission of Labeling** -Labeling should first be submitted in the form of draft labeling with all applications. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

**Submission of Data** -Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

**SPECIFIC INSTRUCTIONS:** Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with new registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amendments actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

**Block A** - Check the appropriate action for which you are submitting this form.

**Section I** - The section must be completed, as applicable, for all registration actions.

1. **Company /Product Number** - Insert your company number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** -If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** -Specify the proposed classification of this product. For most products the classification would be "None".
4. **Product Name** -Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** -The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting on behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** -FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

**SECTION II** -This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA registered product. **The Explanation Section should be used for any additional information regarding Sections I and II.**

1. **Subject of submission** -Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of direction for use"; "notification for...". Attach a separate page if additional space is needed.

**SECTION III** - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** -Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** -Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** -Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** -Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** -Indicate the method product label is attached to retail container.

**SECTION IV** (Contact Point) -This section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory
6. EPA Use Only

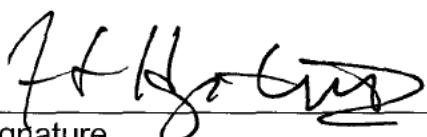
# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
7687-1	2/14/13	Draft label 7687-1 Hercules BreakThru R-D Root Destroyer

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

  
Signature

2/14/13  
Date

Forest Hampton III  
Name (typed)

Product Stewardship Mgr  
Title



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 7687 HCC Holdings, Inc.	2. EPA Product Manager	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Hercules BreakThru R-D Root Destroyer	PM#	
5. Name and Address of Applicant (Include ZIP Code) HCC Holdings, Inc. 4700 West 160th Street, Cleveland, Ohio 44135 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 7687-1 Product Name Hercules BreakThru R-D Root Destroyer	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Updated label for new company name, address and layout. We slightly modified language in Directions for use to call our pre-application precautions and when to apply. Added heading to better delineate between toilet and sewer drain option. Updated disposal and storage section to comply with regulations.

## Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container	4. Size(s) Retail Container 2 pound	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Forest Hampton III	Title Product Stewardship Mgr	Telephone No. (Include Area Code) 1-216-267-7100	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature Forest Hampton III	3. Title Product Stewardship mgr		
4. Typed Name Forest Hampton III	5. Date 2/14/13		



# Material Sent for Data Extraction

Reg. # 7687-1

Description: Notice of Pesticide Reregistration

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 9-26-11

☐ Notification Dated \_\_\_\_\_

☒ New CSF(s) Dated 8-10-09

☐ Other: ~~387534~~

☐ Decision #: 387534

☐ Other Action/Comments: \_\_\_\_\_  
\_\_\_\_\_

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: ROBERT WESTIN

Phone: 305-5721 Division: RD/FB

Date: Sept 26, 2011

## PESTICIDE PRODUCT REREGISTRATION

### LIST OF SUPPORTING DOCUMENTS

**PRODUCT NAME:** R-D Root Destroyer

**COMPANY NAME:** Hercules Chemical Company, Inc.

**EPA REGISTRATION NUMBER:** 7687-1

	DATE
<b>NOTICE OF PESTICIDE REREGISTRATION:</b>	9-26-11
<b>REREGISTRATION ELIGIBILITY DECISION:</b> Copper Sulfate EPA 738-R-09-304	May 2009
<b>LABEL:</b> (pin punch <del>8/17/2009</del> ) 9-16-11	9-26-11
<b>CSF:</b> Basic Alternate	8/10/2009
<b>FORMULATOR'S EXEMPTION:</b>	8/6/2009
<b>DATA MATRIX:</b>	8/6/2009
<b>CERTIFICATION WITH RESPECT TO CITATION OF DATA:</b>	
<b>PRB LABEL REVIEW:</b>	12/16/2010
<b>ACUTE TOXICITY REVIEW:</b> DP384642	12/9/2010
<b>PRODUCT CHEMISTRY REVIEW:</b> DP384639	12/8/2010
<b>OTHER:</b> Child resistant packaging certification	10/29/81

**U.S. ENVIRONMENTAL PROTECTION AGENCY**

Office of Chemical Safety and Pollution Prevention  
Office of Pesticide Programs  
Registration Division (7504P)  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

EPA Reg. Number:

**7687-1**Date of  
Issuance:**SEP 26 2011**

Term of Issuance:

Unconditional

Name of Pesticide Product:

**BREAKTHRU R-D  
Root Destroyer****NOTICE OF PESTICIDE:**

- ☒ Registration  
☒ Reregistration  
(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

**Hercules Chemical Company, Inc.**  
**111 South Street**  
**Passaic, NJ 07055**

Mailed to:

Erastus R. Muchioki  
Compliance Manager

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

EPA received a label amendment request submitted by email on September 16, 2011. EPA grants this request under the authority of section 3(c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended. With this accepted labeling, all requirements set forth in the Reregistration Eligibility Decision for copper sulfate pentahydrate have been satisfied. Therefore, EPA reregisters the product listed above. This action is taken under the authority of section 4(g)(2)(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Page 1 of 2

Signature of Approving Official:

Tony Kish, Product Manager (22)

Fungicide Branch/Registration Division/OPP/OCSP (7504P)

Date:

**SEP 26 2011**

SEP 26 2011

Submit one (1) copy of final printed labeling. Amended labeling will supersede all previously accepted labels. A copy of your label stamped "Accepted" is enclosed for your records. Products shipped after 12 months from the date of this Notice or the next printing of your label, whichever occurs first, must bear the new revised label.

The basic Confidential Statement of Formula (CSF) dated 8/10/2009 submitted in connection with reregistration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable. This CSF supersedes all CSFs previously accepted for this product.

If you have any questions or comments regarding this letter, please contact Robert Westin at (703) 305-5721 or via e-mail at [westin.robert@epa.gov](mailto:westin.robert@epa.gov).

Enclosure:

Label stamped "Accepted"

PRB Label Review dated 12/16/2010

Acute Toxicity Review DP384642 dated 12/9/2010

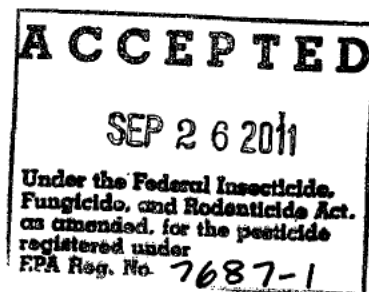
Product Chemistry Review DP384639 dated 12/8/2010

August 31, 2011

DRAFT LABEL

FRONT Primary Panel.

20602  
BREAKTHRU  
R-D Root Destroyer



Active Ingredient: Copper Sulfate Pentahydrate (CAS No. 7758-99-8).....99.0%  
Other Ingredients.....1.0%  
Total.....100.0%  
(Copper as metallic 25.2%)

**DANGER/PELIGRO**

**KEEP OUT REACH OF CHILDREN:** Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to in detail.) **READ ENTIRE LABEL BEFORE USING. SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT.**

Net Wt. 2 lbs, (907 g)

**SIDE PANELS.**

**Guarantee.**

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated when used according to directions, or purchase price will be refunded by Hercules upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.

**HERCULES BREAKTHRU R-D Root Destroyer**

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687NJ01

**TO OPEN: PRY OFF CAP WITH TOOL OR COIN.**

Hercules Breakthru R-D Root Destroyer is a concentrated chemical compound formulated for root control in sewer lines. When used as prescribed in DIRECTIONS, its slow dissolving crystal release a chemical treatment which is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the main tree or shrub. The portion of the roots destroyed will not re-enter the sewer or the drain. Hercules Breakthru R-D Root Destroyer can also be used in lines leading to cesspools and septic tanks when used as directed.

**DIRECTIONS FOR USE**

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL. DO NOT APPLY THIS PRODUCT IN A WAY THAT WILL CONTACT ADULTS, CHILDREN, OR PETS, EITHER DIRECTLY OR THROUGH DRIFT. DO NOT ALLOW ADULTS, CHILDREN, OR PETS TO ENTER THE TREATED AREA UNTIL DUSTS HAVE SETTLED.**

To clear partial stoppages: Use 2 pounds (0.5 lbs metallic copper) in a single application. Pour R-D into toilet bowl nearest sewer line ½ lb. at a time and flush each time to be sure all crystals are carried to sewer line or remove clean out plug and pour entire package directly into sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS. The maximum application rate is 0.5 lbs metallic copper per application. The minimum retreatment interval is 6 months.

To clear complete stoppages: Some flow must be restored using a snake or sewer rod to enable dissolved R-D to travel to the root clogged portion of the sewer. In most cases, several days must be allowed for the infiltration roots to absorb the dissolved chemical, die, decay, and wash away.

To prevent root stoppages in house and building sewer connections: Use 2 pounds (0.5 lb metallic copper) of R-D twice each year. Use same method as for partial stoppages. To avoid wasting R-D by flushing through a largely unobstructed sewer line, apply it in the evening before retiring or during other low flow periods for best results. In sewer mains: Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage.

In storms drains: Do not apply R-D during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above.

#### **PRECAUTIONARY STATEMENTS**

Hazards to Humans and Domestic Animals

**DANGER/PELIGRO:** Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

#### **FIRST AID:**

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first five minutes, and then continue rinsing. Call poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless directed to do so by a poison control center or doctor. Do not give anything by mouth to unconscious person.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or a doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center, doctor, or going for treatment.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and conversions may be needed. You may also contact **1-800-221-9330** for emergency medical treatment information.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

**STORAGE AND DISPOSAL:** Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** Non refillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying.

If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by the label.

This product may not be sold or used in Connecticut or San Francisco Bay Area. Use Hercules Root Force instead.

Manufactured by: Hercules Chemical Co., Passaic, NJ 07055. 1-800-221-9330





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

S903409

## Application for Pesticide - Section I

1. Company/Product Number EPA Est. No. 7687NJ01/7687-1	2. EPA Product Manager Robert Westin	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HERCULES BREAKTHRU R-D Root Destroyer	PM#	
5. Name and Address of Applicant (Include ZIP Code) HERCULES CHEMICAL COMPANY, INC. 111 SOUTH STREET, PASSAIC NJ 07055 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revised Label based on EPA recommendations.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name ERASTUS MUCHIOKI	Title COMPLIANCE & SAFETY MGR.	Telephone No. (Include Area Code) 973-778-5000
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title COMPLIANCE & SAFETY MGR.	
4. Typed Name ERASTUS MUCHIOKI	5. Date 09/16/2011	





**RE: Hercules Breakthru R-D Root Destroyer - Label changes required for product reregistration**

Erastus Muchioki to: Robert Westin

09/15/2011 09:22 AM

History: This message has been replied to.

Mr. Westin,

Actually the insert is a duplicate copy of the directions for use on the container label which should not be there. The reference is supposed to be for a service reminder. I will remove the reference language from the draft copy if this is okay with you.

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115  
E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, September 14, 2011 4:32 PM  
To: Erastus Muchioki  
Subject: Hercules Breakthru R-D Root Destroyer - Label changes required for product reregistration

re: EPA Reg No 7687-1  
EPA Decision 387534

Dear Mr. Muchioki:

The following changes are required to the draft label that you submitted 9/8/11 to support the reregistration of this product:

1. On page 1 under the header DIRECTIONS FOR USE reference is made to "READ DIRECTIONS ON INSERT ENCLOSED". Include the text of this INSERT as part of the draft label for EPA review and acceptance.
2. On page 2 in the first line change "Use 2 to 4 pounds (0.5 lbs to 1.0 lb metallic copper)..." to "Use 2 pounds R-D (0.5 lbs metallic copper)..."
3. On page 2 in the last line of the first paragraph change "The minimum treatment interval is 6 months." to "The minimum retreatment interval is 6 months."
4. On page 2 in the line above the header PRECAUTIONARY STATEMENTS delete "Serious conditions may require larger, more frequent dosage."
5. On page 2 move the FIRST AID box to above the header PRECAUTIONARY STATEMENTS
6. On page 2 in the FIRST AID box move the text "Have the product

container....treatment information." to above the header NOTE TO PHYSICIAN as a separate paragraph.

7. On page 3 in the last line add "Manufactured by:" immediately before "Hercules Chemical Co."

Note: Should you wish to retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or e:mail address.

The Agency is allowing you 10 days to respond with a revised draft label. You may submit a .pdf file of the revised label and completed form 8570-1 to me by email.

Please give me a call if you have any questions.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov



**Hercules Breakthru R-D Root Destroyer - Label changes required for product reregistration**

Robert Westin to: emuchioki

Bcc: Robert Westin

09/14/2011 04:32 PM

re: EPA Reg No 7687-1  
EPA Decision 387534

Dear Mr. Muchioki:

The following changes are required to the draft label that you submitted 9/8/11 to support the reregistration of this product:

1. On page 1 under the header DIRECTIONS FOR USE reference is made to "READ DIRECTIONS ON INSERT ENCLOSED". Include the text of this INSERT as part of the draft label for EPA review and acceptance.
2. On page 2 in the first line change "Use 2 to 4 pounds (0.5 lbs to 1.0 lb metallic copper)...." to "Use 2 pounds R-D (0.5 lbs metallic copper)...."
3. On page 2 in the last line of the first paragraph change "The minimum treatment interval is 6 months." to "The minimum retreatment interval is 6 months."
4. On page 2 in the line above the header PRECAUTIONARY STATEMENTS delete "Serious conditions may require larger, more frequent dosage."
5. On page 2 move the FIRST AID box to above the header PRECAUTIONARY STATEMENTS
6. On page 2 in the FIRST AID box move the text "Have the product container....treatment information." to above the header NOTE TO PHYSICIAN as a separate paragraph.
7. On page 3 in the last line add "Manufactured by:" immediately before "Hercules Chemical Co."

Note: Should you wish to retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved

registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or e:mail address.

The Agency is allowing you 10 days to respond with a revised draft label. You may submit a .pdf file of the revised label and completed form 8570-1 to me by email.

Please give me a call if you have any questions.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB

phone: 703-305-5721

FAX: 703-305-6920

email: [westin.robert@epamail.epa.gov](mailto:westin.robert@epamail.epa.gov)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐  
☒  
☐

Registration  
Amendment  
Other

OPP Identifier Number

S903255

## Application for Pesticide - Section I

1. Company/Product Number EPA Est. No. 7687NJ01/7687-1	2. EPA Product Manager Robert Westin	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HERCULES BREAKTHRU R-D Root Destroyer	PM#	
5. Name and Address of Applicant (Include ZIP Code)  HERCULES CHEMICAL COMPANY, INC. 111 SOUTH STREET, PASSAIC NJ 07055  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>8/31/11</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revised Label based on EPA recommendations.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name ERASTUS MUCHIOKI		Title COMPLIANCE & SAFETY MGR.	
		Telephone No. (Include Area Code) 973-778-5000	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title COMPLIANCE & SAFETY MGR.	
4. Typed Name ERASTUS MUCHIOKI		5. Date 09/08/2011	

August 31, 2011

DRAFT LABEL.

FRONT Primary Panel.

20602  
BREAKTHRU  
R-D Root Destroyer

Active Ingredient: Copper Sulfate Pentahydrate (CAS No. 7758-99-8).....99.0%  
Other Ingredients.....1.0%  
Total.....100.0%  
(Copper as metallic 25.2%)

**DANGER/PELIGRO**

KEEP OUT REACH OF CHILDREN: Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to in detail.) READ ENTIRE LABEL BEFORE USING. SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT.

Net Wt. 2 lbs, (907 g)

**SIDE PANELS.**

**Guarantee.**

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated when used according to directions, or purchase price will be refunded by Hercules upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.

**HERCULES BREAKTHRU R-D Root Destroyer**

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687NJ01

TO OPEN: PRY OFF CAP WITH TOOL OR COIN.

Hercules Breakthru R-D Root Destroyer is a concentrated chemical compound formulated for root control in sewer lines. When used as prescribed in DIRECTIONS, its slow dissolving crystal release a chemical treatment which is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the main tree or shrub. The portion of the roots destroyed will not re-enter the sewer or the drain. Hercules Breakthru R-D Root Destroyer can also be used in lines leading to cesspools and septic tanks when used as directed.

**DIRECTIONS FOR USE**

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL. DO NOT APPLY THIS PRODUCT IN A WAY THAT WILL CONTACT ADULTS, CHILDREN, OR PETS, EITHER DIRECTLY OR THROUGH DRIFT. DO NOT ALLOW ADULTS, CHILDREN, OR PETS TO ENTER THE TREATED AREA UNTIL DUSTS HAVE SETTLED.

*Not accepted 9-14-11*



re  
To clear partial stoppages: Use 2 ~~to 4~~ pounds (0.5 lbs ~~to 1.0 lb~~ metallic copper) in a single application. Pour R-D into toilet bowl nearest sewer line ½ lb. at a time and flush each time to be sure all crystals are carried to sewer line or remove clean out plug and pour entire package directly into sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS. The maximum application rate is 0.5 lbs metallic copper per application. The minimum treatment interval is 6 months.

To clear complete stoppages: Some flow must be restored using a snake or sewer rod to enable dissolved R-D to travel to the root clogged portion of the sewer. In most cases, several days must be allowed for the infiltration roots to absorb the dissolved chemical, die, decay, and wash away.

To prevent root stoppages in house and building sewer connections: Use 2 pounds (0.5 lb metallic copper) of R-D twice each year. Use same method as for partial stoppages. To avoid wasting R-D by flushing through a largely unobstructed sewer line, apply it in the evening before retiring or during other low flow periods for best results. In sewer mains: Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage.

In storms drains: Do not apply R-D during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above. ~~Serious conditions may require larger, more frequent dosage.~~

#### PRECAUTIONARY STATEMENTS

##### Hazards to Humans and Domestic Animals

**DANGER/PELIGRO:** Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

##### FIRST AID:

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first five minutes, and then continue rinsing. Call poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless directed to do so by a poison control center or doctor. Do not give anything by mouth to unconscious person.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or a doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and conversions may be needed. Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also contact 1-800-221-9330 for emergency medical treatment information.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

**STORAGE AND DISPOSAL:** Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** Non refillable container. Do not reuse or refill this container.

Offer for recycling, if available. Clean container promptly after emptying.

If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by the label.

This product may not be sold or used in Connecticut or San Francisco Bay Area. Use Hercules Root Force instead.

Hercules Chemical Co., Passaic, NJ 07055. 1-800-221-9330 [www.herchem.com](http://www.herchem.com)



August 31, 2011

DRAFT LABEL.

FRONT Primary Panel.

20602  
BREAKTHRU  
R-D Root Destroyer

Active Ingredient: Copper Sulfate Pentahydrate (CAS No. 7758-99-8).....99.0%  
Other Ingredients.....1.0%  
Total.....100.0%  
(Copper as metallic 25.2%)

**DANGER/PELIGRO**

KEEP OUT REACH OF CHILDREN: Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to in detail.) READ ENTIRE LABEL BEFORE USING. SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENT.

Net Wt. 2 lbs, (907 g)

**SIDE PANELS.**

**Guarantee.**

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated when used according to directions, or purchase price will be refunded by Hercules upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.

**HERCULES BREAKTHRU R-D Root Destroyer**

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687NJ01

TO OPEN: PRY OFF CAP WITH TOOL OR COIN.

Hercules Breakthru R-D Root Destroyer is a concentrated chemical compound formulated for root control in sewer lines. When used as prescribed in DIRECTIONS, its slow dissolving crystal release a chemical treatment which is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the main tree or shrub. The portion of the roots destroyed will not re-enter the sewer or the drain. Hercules Breakthru R-D Root Destroyer can also be used in lines leading to cesspools and septic tanks when used as directed.

**DIRECTIONS FOR USE**

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL. DO NOT APPLY THIS PRODUCT IN A WAY THAT WILL CONTACT ADULTS, CHILDREN, OR PETS, EITHER DIRECTLY OR THROUGH DRIFT. DO NOT ALLOW ADULTS, CHILDREN, OR PETS TO ENTER THE TREATED AREA UNTIL DUSTS HAVE SETTLED.

To clear partial stoppages: Use 2 to 4 pounds (0.5 lbs to 1.0 lb metallic copper) in a single application. Pour R-D into toilet bowl nearest sewer line ½ lb. at a time and flush each time to be sure all crystals are carried to sewer line or remove clean out plug and pour entire package directly into sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS. The maximum application rate is 0.5 lbs metallic copper per application. The minimum treatment interval is 6 months.

To clear complete stoppages: Some flow must be restored using a snake or sewer rod to enable dissolved R-D to travel to the root clogged portion of the sewer. In most cases, several days must be allowed for the infiltration roots to absorb the dissolved chemical, die, decay, and wash away.

To prevent root stoppages in house and building sewer connections: Use 2 pounds (0.5 lb metallic copper) of R-D twice each year. Use same method as for partial stoppages. To avoid wasting R-D by flushing through a largely unobstructed sewer line, apply it in the evening before retiring or during other low flow periods for best results. In sewer mains: Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage.

In storms drains: Do not apply R-D during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above. Serious conditions may require larger, more frequent dosage.

#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**DANGER/PELIGRO: Corrosive.** Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

#### FIRST AID:

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses if present, after the first five minutes, and then continue rinsing. Call poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless directed to do so by a poison control center or doctor. Do not give anything by mouth to unconscious person.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or a doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth to mouth if possible. Call a poison control center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and conversions may be needed. Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also contact **1-800-221-9330** for emergency medical treatment information.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

**STORAGE AND DISPOSAL:** Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** Non refillable container. Do not reuse or refill this container.

Offer for recycling, if available. Clean container promptly after emptying.

If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by the label.

This product may not be sold or used in Connecticut or San Francisco Bay Area. Use Hercules Root Force instead.

Hercules Chemical Co., Passaic, NJ 07055. 1-800-221-9330 [www.herchem.com](http://www.herchem.com)



**RE: Breakthru R-D Root Destroyer: Label changes required for product  
reregistration EPA Reg No 7687-1**

Robert Westin to: Erastus Muchioki  
Bcc: Robert Westin

09/01/2011 08:35 AM

Erastus:

The label that you submit now will be a revised draft label with large print (like the August 6, 2009 draft label). It will be OK if the instructions run over to a second page on the draft label.

On the final printed label you may have to redesign the product name logo so it doesn't take up as much room on the front panel of the label. See the Label Review Manual for the requirements for the final printed label.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB

phone: 703-305-5721

FAX: 703-305-6920

email: westin.robert@epamail.epa.gov

"Erastus Muchioki" Robert, Also under the DANGER/PELIGRO, o...

08/31/2011 04:27:33 PM

From: "Erastus Muchioki" <EMuchioki@herchem.com>  
To: Robert Westin/DC/USEPA/US@EPA  
Date: 08/31/2011 04:27 PM  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Robert,

Also under the DANGER/PELIGRO, once I put the Spanish information on the front panel, there will not be enough room on the actual label for rest of precautionary statements about reading the entire label, and the location of the precaution statement.

Any suggestion will be appreciated.

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115  
E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, August 31, 2011 3:58 PM  
To: Erastus Muchioki  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Erastus: sorry I missed that change.

Change the ingredient statement to read "Copper sulfate pentahydrate (CAS No. 7758-99-8)"

Change "copper a metallic 25.0%" to read "Copper as metallic 25.2%"

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov

From: "Erastus Muchioki" <EMuchioki@herchem.com>  
To: Robert Westin/DC/USEPA/US@EPA  
Date: 08/31/2011 02:48 PM  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required  
for  
product reregistration

Robert,  
I have another question, I need clarification on item # 3 for  
ingredients revision on the label

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115  
E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [  
mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, August 31, 2011 1:32 PM  
To: Erastus Muchioki  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required for  
product reregistration

Dear Mr. Muchioki:

The current containers may be used until 12 months after the date the  
product is reregistered or until the next printing of containers,  
whichever comes first.

The statement KEEP OUT OF REACH OF CHILDREN should remain in English.

Above this statement replace DANGER with DANGER/PELIGRO

Add the Spanish language warning and English translation below the  
statement KEEP OUT OF REACH OF CHILDREN.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov

From: "Erastus Muchioki" <EMuchioki@herchem.com>  
To: Robert Westin/DC/USEPA/US@EPA  
Date: 08/31/2011 12:43 PM  
Subject: RE: Breakthru R-D Root Destroyer: Label  
changes  
required for  
product reregistration

Mr. Westin,  
One of your recommendations, are you saying that " KEEP OUT OF REACH OF  
CHILDREN" should also be in Spanish? How long do we have to use the  
current printed containers?

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115  
E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [  
mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, August 31, 2011 11:05 AM  
To: Erastus Muchioki  
Subject: Breakthru R-D Root Destroyer: Label changes required for  
product reregistration

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
11 South Street  
Passaic, NJ 07055-9100

Subject: Reregistration Label  
Changes for Copper  
Sulfate  
Pentahydrate

Breakthru R-D Root  
Destroyer  
EPA Reg. No. 7687-1  
EPA Decision Number 387534

Dear Mr. Muchioki:

The Agency has reviewed the product specific data submitted for  
Breakthru R-D Root Destroyer (EPA Reg. No. 7687-1) in response to the  
Copper Sulfate Pentahydrate RED Product Specific Data Call-In. The

Product Reregistration Branch has completed a Preliminary Label Assessment for your product and has determined that further label changes are necessary to bring the label that you submitted August 10, 2009 into compliance with the RED requirements. See the enclosed label review dated December 16, 2010 for specifics except:

Disregard requirements 1 and 2; the EPA Product Manager has decided that this product is not a Restricted Use pesticide.

(See attached file: PRB label review 7687-1 20101216.pdf)

The following changes to the label are also required:

Add the following below the statement KEEP OUT OF REACH OF CHILDREN:

"Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)"

On page 2 in the section PRECAUTIONARY STATEMENTS delete the sentence "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."

Under the header DIRECTIONS FOR USE change "INCONSISTENR" to "INCONSISTENT"

Revise the STORAGE AND DISPOSAL instructions to comply with the requirements of Pesticide Registration Notice 2007-4.

Put the FIRST AID instructions into a box to set them off from the rest of the text.

In the FIRST AID instructions change "NOTE TP PHYSICIAN" to "NOTE TO PHYSICIAN"

Put the STORAGE AND DISPOSAL instructions into a box to set them off from the rest of the text.

Once these label changes have been made, submit 4 new draft copies (one with the annotated changes from the current acceptable label) to the Registration Division where the final label review will be conducted.

In addition (optional), we request that you include an electronic copy of the revised label in .PDF format on a CD-ROM per the technical guidance on our website:

[http://www.epa.gov/pesticides/regulating/registering/submissions/filename\\_specs.pdf](http://www.epa.gov/pesticides/regulating/registering/submissions/filename_specs.pdf)

Please be sure to follow the format for naming the .pdf file as prescribed in the guidance.

Alternatively, you may email me a .pdf file of the revised draft label.

The Agency is providing you with 10 days from receipt of this letter to adequately address the deficiencies noted in the Preliminary Label Assessment and submit the revised labeling. In the absence of these changes, the Agency does not believe that the product containing copper sulfate pentahydrate meets the standard for registration under FIFRA. Failure to adequately respond within the 10-day timeframe may result in either a Notice of Intent to Suspend or a Notice of Intent to Cancel affecting the registration of the subject product, as appropriate.

Please give me a call if you have any questions.

Robert Westin


U.S. Environmental Protection Agency  
OPP/RD/FB

phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov



7687-1



RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration 

Robert Westin to: Erastus Muchioki  
Bcc: Robert Westin

08/31/2011 03:57 PM

Erastus: sorry I missed that change:

Change the ingredient statement to read "Copper sulfate pentahydrate (CAS No. 7758-99-8)"

Change "copper a metallic 25.0%" to read "Copper as metallic 25.2%"

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov

"Erastus Muchioki" Robert, I have another question, I need clarifica...

08/31/2011 02:48:22 PM

From: "Erastus Muchioki" <EMuchioki@herchem.com>  
To: Robert Westin/DC/USEPA/US@EPA  
Date: 08/31/2011 02:48 PM  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Robert,  
I have another question, I need clarification on item # 3 for ingredients revision on the label

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115  
E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, August 31, 2011 1:32 PM  
To: Erastus Muchioki  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Dear Mr. Muchioki:

The current containers may be used until 12 months after the date the product is reregistered or until the next printing of containers, whichever comes first.

The statement KEEP OUT OF REACH OF CHILDREN should remain in English.

Above this statement replace DANGER with DANGER/PELIGRO

Add the Spanish language warning and English translation below the statement KEEP OUT OF REACH OF CHILDREN.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov

From: "Erastus Muchioki" <EMuchioki@herchem.com>  
To: Robert Westin/DC/USEPA/US@EPA  
Date: 08/31/2011 12:43 PM  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required  
for  
product reregistration

Mr. Westin,  
One of your recommendations, are you saying that " KEEP OUT OF REACH OF CHILDREN" should also be in Spanish? How long do we have to use the current printed containers?

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115

E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [  
mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, August 31, 2011 11:05 AM  
To: Erastus Muchioki  
Subject: Breakthru R-D Root Destroyer: Label changes required for  
product reregistration

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
11 South Street  
Passaic, NJ 07055-9100

Subject: Reregistration Label Changes for Copper  
Sulfate  
Pentahydrate

Breakthru R-D Root Destroyer  
EPA Reg. No. 7687-1  
EPA Decision Number 387534

Dear Mr. Muchioki:

The Agency has reviewed the product specific data submitted for Breakthru R-D Root Destroyer (EPA Reg. No. 7687-1) in response to the Copper Sulfate Pentahydrate RED Product Specific Data Call-In. The Product Reregistration Branch has completed a Preliminary Label Assessment for your product and has determined that further label changes are necessary to bring the label that you submitted August 10, 2009 into compliance with the RED requirements. See the enclosed label review dated December 16, 2010 for specifics except:

Disregard requirements 1 and 2; the EPA Product Manager has decided that this product is not a Restricted Use pesticide.

(See attached file: PRB label review 7687-1 20101216.pdf)

The following changes to the label are also required:

Add the following below the statement KEEP OUT OF REACH OF CHILDREN:  
"Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)"  
On page 2 in the section PRECAUTIONARY STATEMENTS delete the sentence "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."  
Under the header DIRECTIONS FOR USE change "INCONSISTENR" to "INCONSISTENT"  
Revise the STORAGE AND DISPOSAL instructions to comply with the requirements of Pesticide Registration Notice 2007-4.  
Put the FIRST AID instructions into a box to set them off from the rest of the text.  
In the FIRST AID instructions change "NOTE TP PHYSICIAN" to 'NOTE TO PHYSICIAN"  
Put the STORAGE AND DISPOSAL instructions into a box to set them off from the rest of the text.

Once these label changes have been made, submit 4 new draft copies (one with the annotated changes from the current acceptable label) to the Registration Division where the final label review will be conducted. In addition (optional), we request that you include an electronic copy of the revised label in .PDF format on a CD-ROM per the technical guidance on our website:  
[http://www.epa.gov/pesticides/regulating/registering/submissions/filename\\_specs.pdf](http://www.epa.gov/pesticides/regulating/registering/submissions/filename_specs.pdf)

Please be sure to follow the format for naming the .pdf file as prescribed in the guidance.

Alternatively, you may email me a .pdf file of the revised draft label.

The Agency is providing you with 10 days from receipt of this letter to adequately address the deficiencies noted in the Preliminary Label Assessment and submit the revised labeling. In the absence of these changes, the Agency does not believe that the product containing copper sulfate pentahydrate meets the standard for registration under FIFRA. Failure to adequately respond within the 10-day timeframe may result in either a Notice of Intent to Suspend or a Notice of Intent to Cancel affecting the registration of the subject product, as appropriate.

Please give me a call if you have any questions.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov



7687-1  
RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Robert Westin to: Erastus Muchioki  
Bcc: Robert Westin

08/31/2011 01:31 PM

Dear Mr. Muchioki:

The current containers may be used until 12 months after the date the product is reregistered or until the next printing of containers, whichever comes first.

The statement KEEP OUT OF REACH OF CHILDREN should remain in English.

Above this statement replace DANGER with DANGER/PELIGRO

Add the Spanish language warning and English translation below the statement KEEP OUT OF REACH OF CHILDREN.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: westin.robert@epamail.epa.gov

"Erastus Muchioki" Mr. Westin, One of your recommendations, are...

08/31/2011 12:43:29 PM

From: "Erastus Muchioki" <EMuchioki@herchem.com>  
To: Robert Westin/DC/USEPA/US@EPA  
Date: 08/31/2011 12:43 PM  
Subject: RE: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Mr. Westin,

One of your recommendations, are you saying that "KEEP OUT OF REACH OF CHILDREN" should also be in Spanish? How long do we have to use the current printed containers?

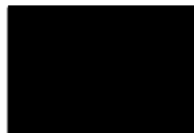
Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055  
Phone: 973-778-5000  
Fax: 973-777-4115  
E-mail: emuchioki@herchem.com

-----Original Message-----

From: Westin.Robert@epamail.epa.gov [mailto:Westin.Robert@epamail.epa.gov]  
Sent: Wednesday, August 31, 2011 11:05 AM  
To: Erastus Muchioki  
Subject: Breakthru R-D Root Destroyer: Label changes required for product reregistration

Erastus Muchioki

7687-1 is



Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
11 South Street  
Passaic, NJ 07055-9100

Subject: Reregistration Label Changes for Copper Sulfate  
Pentahydrate  
Breakthru R-D Root Destroyer  
EPA Reg. No. 7687-1  
EPA Decision Number 387534

Dear Mr. Muchioki:

The Agency has reviewed the product specific data submitted for Breakthru R-D Root Destroyer (EPA Reg. No. 7687-1) in response to the Copper Sulfate Pentahydrate RED Product Specific Data Call-In. The Product Reregistration Branch has completed a Preliminary Label Assessment for your product and has determined that further label changes are necessary to bring the label that you submitted August 10, 2009 into compliance with the RED requirements. See the enclosed label review dated December 16, 2010 for specifics except:

Disregard requirements 1 and 2; the EPA Product Manager has decided that this product is not a Restricted Use pesticide.

(See attached file: PRB label review 7687-1 20101216.pdf)

The following changes to the label are also required:

Add the following below the statement KEEP OUT OF REACH OF CHILDREN:  
"Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)"  
On page 2 in the section PRECAUTIONARY STATEMENTS delete the sentence  
"Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."  
Under the header DIRECTIONS FOR USE change "INCONSISTENR" to  
"INCONSISTENT"  
Revise the STORAGE AND DISPOSAL instructions to comply with the requirements of Pesticide Registration Notice 2007-4.  
Put the FIRST AID instructions into a box to set them off from the rest of the text.  
In the FIRST AID instructions change "NOTE TP PHYSICIAN" to 'NOTE TO PHYSICIAN"  
Put the STORAGE AND DISPOSAL instructions into a box to set them off from the rest of the text.

Once these label changes have been made, submit 4 new draft copies (one with the annotated changes from the current acceptable label) to the Registration Division where the final label review will be conducted.  
In addition (optional), we request that you include an electronic copy of the revised label in .PDF format on a CD-ROM per the technical guidance on our website:  
[http://www.epa.gov/pesticides/regulating/registering/submissions/filename\\_specs.pdf](http://www.epa.gov/pesticides/regulating/registering/submissions/filename_specs.pdf).  
Please be sure to follow the format for naming the .pdf file as prescribed in the guidance.

Alternatively, you may email me a .pdf file of the revised draft label.

The Agency is providing you with 10 days from receipt of this letter to

adequately address the deficiencies noted in the Preliminary Label Assessment and submit the revised labeling. In the absence of these changes, the Agency does not believe that the product containing copper sulfate pentahydrate meets the standard for registration under FIFRA.

Failure to adequately respond within the 10-day timeframe may result in either a Notice of Intent to Suspend or a Notice of Intent to Cancel affecting the registration of the subject product, as appropriate.

Please give me a call if you have any questions.

Robert Westin

U.S. Environmental Protection Agency

OPP/RD/FB

phone: 703-305-5721

FAX: 703-305-6920

email: westin.robert@epamail.epa.gov





**Breakthru R-D Root Destroyer: Label changes required for product reregistration**

Robert Westin to: emuchioki

08/31/2011 11:04 AM

Bcc: Robert Westin

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
11 South Street  
Passaic, NJ 07055-9100

Subject: Reregistration Label Changes for Copper Sulfate Pentahydrate  
Breakthru R-D Root Destroyer  
EPA Reg. No. 7687-1  
EPA Decision Number 387534

Dear Mr. Muchioki:

The Agency has reviewed the product specific data submitted for Breakthru R-D Root Destroyer (EPA Reg. No. 7687-1) in response to the Copper Sulfate Pentahydrate RED Product Specific Data Call-In. The Product Reregistration Branch has completed a Preliminary Label Assessment for your product and has determined that further label changes are necessary to bring the label that you submitted August 10, 2009 into compliance with the RED requirements. See the enclosed label review dated December 16, 2010 for specifics except:

1. Disregard requirements 1 and 2; the EPA Product Manager has decided that this product is not a Restricted Use pesticide.



PRB label review 7687-1 20101216.pdf

The following changes to the label are also required:

1. Add the following below the statement KEEP OUT OF REACH OF CHILDREN: "Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)"
2. On page 2 in the section PRECAUTIONARY STATEMENTS delete the sentence "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."
3. Under the header DIRECTIONS FOR USE change "INCONSISTENR" to "INCONSISTENT"
4. Revise the STORAGE AND DISPOSAL instructions to comply with the requirements of Pesticide Registration Notice 2007-4.

5. Put the FIRST AID instructions into a box to set them off from the rest of the text.
6. In the FIRST AID instructions change "NOTE TP PHYSICIAN" to 'NOTE TO PHYSICIAN"
7. Put the STORAGE AND DISPOSAL instructions into a box to set them off from the rest of the text.

Once these label changes have been made, submit 4 new draft copies (one with the annotated changes from the current acceptable label) to the Registration Division where the final label review will be conducted. In addition (optional), we request that you include an electronic copy of the revised label in .PDF format on a CD-ROM per the technical guidance on our website:

[http://www.epa.gov/pesticides/regulating/registering/submissions/filename\\_specs.pdf](http://www.epa.gov/pesticides/regulating/registering/submissions/filename_specs.pdf). Please be sure to follow the format for naming the .pdf file as prescribed in the guidance.

Alternatively, you may email me a .pdf file of the revised draft label.

The Agency is providing you with 10 days from receipt of this letter to adequately address the deficiencies noted in the Preliminary Label Assessment and submit the revised labeling. In the absence of these changes, the Agency does not believe that the product containing copper sulfate pentahydrate meets the standard for registration under FIFRA. Failure to adequately respond within the 10-day timeframe may result in either a Notice of Intent to Suspend or a Notice of Intent to Cancel affecting the registration of the subject product, as appropriate.

Please give me a call if you have any questions.

Robert Westin

U.S. Environmental Protection Agency  
OPP/RD/FB  
phone: 703-305-5721  
FAX: 703-305-6920  
email: [westin.robert@epamail.epa.gov](mailto:westin.robert@epamail.epa.gov)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, DC 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

**CERTIFIED MAIL**

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
11 South Street  
Passaic, NJ 07055-9100

Subject: Reregistration Label Changes for Copper Sulfate Pentahydrate  
Breakthru R-D Root Destroyer  
EPA Reg. No. 7687-1  
EPA Decision Number 387534

Dear Mr. Muchioki:

The Agency has reviewed the product specific data submitted for Breakthru R-D Root Destroyer (EPA Reg. No. 7687-1) in response to the Copper Sulfate Pentahydrate RED Product Specific Data Call-In. The Product Reregistration Branch has completed a Preliminary Label Assessment for your product and has determined that further label changes are necessary to bring the label that you submitted August 10, 2009 into compliance with the RED requirements. See the enclosed label review dated December 16, 2010 for specifics except:

1. Disregard requirements 1 and 2; the EPA Product Manager has decided that this product is not a Restricted Use pesticide.
2. Requirement 3: see Finding 4 in the Product Chemistry Review DP384639 dated December 8, 2010.

The following change to the label is also required:

3. On page 2 in the section PRECAUTIONARY STATEMENTS delete the sentence "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."

Once these label changes have been made, submit 4 new draft copies (one with the annotated changes from the current acceptable label) to the Registration Division where the final label review will be conducted. In addition (optional), we request that you include an electronic copy of the revised label in .PDF format on a CD-ROM per the technical guidance on our website:

[http://www.epa.gov/pesticides/regulating/registering/submissions/filename\\_specs.pdf](http://www.epa.gov/pesticides/regulating/registering/submissions/filename_specs.pdf).  
Please be sure to follow the format for naming the .pdf file as prescribed in the guidance.

The Agency is providing you with 45 days from receipt of this letter to adequately address the deficiencies noted in the Preliminary Label Assessment and submit the revised labeling. In the absence of these changes, the Agency does not believe that the product containing copper sulfate pentahydrate meets the standard for registration under FIFRA. Failure to adequately respond within the 45-day timeframe may result in either a Notice of Intent to Suspend or a Notice of Intent to Cancel affecting the registration of the subject product, as appropriate.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at [westin.robert@epa.gov](mailto:westin.robert@epa.gov).

Sincerely,

Tony Kish  
Product Manager (22)  
Fungicide Branch  
Registration Division (7504P)

Enclosure:

Label Review dated December 16, 2010  
Product Chemistry Review DP384639 dated December 8, 2010  
Acute Toxicity Review DP384642 dated December 9, 2010

Date: December 16, 2010

Reg. No.: 7687-1

Product Name: R-D Root Destroyer (Name of record with the Agency), Breakthru R-D Root Destroyer (Name on draft label)

PM Name/Number: Tony Kish, Risk Management Team 22

Primary Reviewer: Judy Loranger

Secondary Reviewer: Mark Perry

*Judy Loranger 1/12/11*  
*MJP*

New label or date of RD amended label: New, Received on 8/7/09

Formulation Type: Crystalline per OPPIN

Active Ingredient Assessed: Copper sulfate pentahydrate/024401

Other ai's in product

Name/PC code:

N/A

Reregistration Status or Registration Date:

N/A

Note to PM:

1) The Risk Management and Implementation Branch V (RMIB V) believes that the Environmental Hazards statements currently on the label are appropriate for this product but defers to RD regarding the acceptability of this text.

Assessment can be found N:\prb\label\007687\001

1) This product has been classified as a Restricted Use Pesticide due to acute oral toxicity and eye irritation. Add the following text to the top of the front panel of the label, preferably enclosed in a box:

<p>Restricted Use Pesticide</p> <p>Due to acute oral toxicity and eye irritation.</p> <p>For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The above text must be set in type of the same minimum size as required for human hazard signal words and appear with sufficient prominence relative to the other text and graphic material on the front panel to make it unlikely to be overlooked under customary conditions of purchase and use.

2) Add “Restricted Use Pesticide” immediately below the heading “Directions For Use”.

3) Revisions are needed to the ingredient statement and the footnote to the ingredient statement as specified in the product chemistry review.

4) Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label in the following order:

“IF IN EYES:...

IF SWALLOWED:...

IF ON SKIN OR CLOTHING:...

IF INHALED:..”

5) It is recommended that the text “Hercules Toll Free No. 800-221-9330” at the end of the first aid statements be revised per the acute toxicity review to read “You may also contact 1-800-221-9330 for emergency medical treatment information.”

6) The Agency recommends that additional text be added to the Note to Physician that addresses eye irritation concerns.

7) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

“DANGER

Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes or on clothing. Wear goggles or face shield. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.”

8) Per the RED, add the following text to the directions for use:

“Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.

Do not allow adults, children, or pets to enter the treated area until dusts have settled.”

9) Per the Appendix A of the RED, the following text must be added to the directions for use and any conflicting text (“use 2 to 4 pounds [0.5 lbs to 1.0 lb metallic copper] in a single application,” “use 4 to 6 pounds [1.0 to 1.5 lbs metallic copper] at one time or 4 pounds for two consecutive weeks”) must be deleted or revised to comply with the RED:

“The maximum application rate is 0.5 lbs metallic copper per application.  
The minimum retreatment interval is 6 months.”



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

December 9, 2010

MEMORANDUM:

Subject: EPA Reg. No.: 7687-1/ BREAKTHRU R-D ROOT DESTROYER  
DP Barcode: 384642  
Case No.: 0649

From: John L. Dupuy Ph.D, Pathologist  
Risk Management and Implementation Branch V  
Pesticide Re-evaluation Division (7508P)

*John L. Dupuy* 12/9/10  
*MJP*

To: Veronica Dutch, CRM  
Risk Management and Implementation Branch V  
Pesticide Re-evaluation Division (7508P)

Applicant: HERCULES CHEMICAL COMPANY, INC.  
111 South Street  
Passaic, NJ 07055

FORMULATION FROM EPA Reg. No. 7687-1 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Copper sulfate pentahydrate .....	99.0%
<u>Inert Ingredient(s):</u> .....	1.0%
Total	100.0%

BACKGROUND: In the 8 month response to the Coppers RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 7687-1. The MRIDs are 453397-01 (81-1), 453397-02 (81-2), 431470-01(81-3), 453397-03 (81-4), 453397-04 (81-5), 453397-05 (81-6). The studies were conducted by Stillmeadow, Inc. The test material used in these studies was Triangle Brand Copper Sulfate Crystal, EPA Reg. No. 1278-8 (99.0%). The studies were reviewed and found to be acceptable by RMIBV/PRD on 4/12/10.

RECOMMENDATIONS:

- The toxicity studies submitted and cited are acceptable to support the reregistration of EPA Reg. No. 7687-1.

The acute toxicity profile for EPA Reg. No. 7687-1 is currently:

Acute Oral	II	Cited (LD <sub>50</sub> = 246 mg/kg)
Acute Dermal	IV	Cited (LD <sub>50</sub> > 5050 mg/kg)
Acute Inhalation	IV	Cited (LC <sub>50</sub> > 2.95 mg/L)
Primary Eye	I	Cited
Primary Dermal	IV	Cited
Skin Sensitization	non-sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.



LABELING:

ID #: 007687-00001                      BREAKTHRU R-D ROOT DESTROYER

**RESTRICTED USE CLASSIFICATION Criteria met:**

Due to Primary Eye Toxicity Category I and acute oral LD LD<sub>50</sub>.

**SIGNAL WORD:                      DANGER      PELIGRO**

**CHILD RESISTANT PACKAGING Criteria met::**

Due to primary eye irritation toxicity category I and Acute Oral Toxicity, LD<sub>50</sub> < 1500 mg/kg.

**SIGNAL WORD:                      DANGER                      PELIGRO**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS\*:**

Corrosive. Causes irreversible eye damage. May be fatal if swallowed. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

**FIRST AID:**

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

**USER SAFETY RECOMMENDATIONS:**

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

The proposed label must contain the following guidance:

**NOTE TO PHYSICIAN:**

Probable mucosal damage may contraindicate the use of gastric lavage.

---

Note to CRM/PM/Registrant:

The proposed label should contain a Note to Physician which addresses the primary eye irritation Toxicity Category I. The following statements are some suggested types of information that could be included, if applicable, in the Note to Physicians:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

DATE OUT: 08/DEC/10

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [ ]; MUP [ ]; EUP [x]

BARCODE NO.: 384639 REG./FILE SYMBOL NO.: 7687-1

PRODUCT NAME: BREAKTHRU R-D Root Destroyer

MRID NOS.: 477544-01, 475077-01, 406811-03, 433641-01, -02, -04, -05

COMPANY NAME: Hercules Chemical Co., Inc. ACTION CODE: 676

FROM: Shirley H. Keel, Environmental Protection Specialist  
Product Chemistry Team  
RMIB V/PRD (7508P)



TO: Veronica Dutch, CRM  
Risk Management and Implementation Branch V  
Pesticide Re-evaluation Division (7508P)

### INTRODUCTION:

A Reregistration Eligibility Decision (RED) entitled *Coppers*, including Case Nos. 0636, 0649, 4025 and 4026, was issued in July 2006 for the Copper Compounds. This RED included 34 copper compounds of which 13 were indicated as having been cancelled. According to the *Coppers* RED, the generic database supporting the reregistration of Copper Compounds for their current uses has been reviewed and found to be substantially complete.

In the 8-month response to the *Coppers* RED, the registrant submitted a Confidential Statement of Formula (CSF), a basic formulation dated 8/10/09, and a draft label (pin-punched 8/17/09). The registrant cited product chemistry data from EPA Reg. No. 73385-1 to support the reregistration of BREAKTHRU R-D Root Destroyer, EPA Reg. No. 7687-1.

### FINDINGS:

1. EPA Reg. No. 7687-1 is an end-use product manufactured by an integrated process. It contains the active ingredient Copper Sulfate Pentahydrate at a label claim nominal concentration of 99%. The metallic copper equivalent of 99% Copper Sulfate Pentahydrate is 25.2%.
2. The review of the CSFs, labels (Reg. No. 7687-1 vs. 73385-1) and other available information indicates that the citation is acceptable. The subject product may rely on product chemistry data from EPA Reg. No. 73385-1 to support its product chemistry reregistration requirements. The product chemistry data in MRID Nos. 475077-01, 406811-03, 433641-01, -02, -04 and -05 were reviewed and accepted by S. Keel (PRD) on 1/7/10 under Barcode No. 364269. MRID No. 477544-01 was reviewed and accepted by S. Keel (PRD) on 3/23/10 under Barcode No. 375603. The product chemistry data requirements for the subject product, corresponding to Subgroups A and B which pertain to Product Identity, Composition and Analysis, and Physical and Chemical Properties respectively are satisfied.

3. The CSF for the basic formulation, dated 8/10/09, is acceptable to support the reregistration of the subject product.

**Note to PM:**

The information on EPA Reg. No. 7687-1 recorded in OPPIN database needs to be **updated**. In the Window of Product Registration, the Percent Wt Value should be changed from 96.9% to **99%** in order to be consistent with the nominal concentration posted on the current label and the basic CSF.

4. Per Coppers RED, the Ingredient Statement panel must state the original form of copper compounds as the active ingredient with respective **Chemical Abstracts Service number**. In the ingredient panel of the draft label, change "Copper Sulfate, Pentahydrate" to read "Copper sulfate pentahydrate (CAS No. 7758-99-8);" and change "Copper as metallic 25.0%" to read "Copper as metallic **25.2%**." Otherwise the Ingredient statement is in compliance with the requirements of 40 CFR 156.10(g) and PR Notice 91- 2. There are no physical/chemical hazards present in the product that will trigger the Physical or Chemical Hazards subheading.
5. The Storage and Disposal section of the draft label needs a minor revision. It is recommended that the Storage and Disposal statements be presented in a text box for increased prominence. The Storage and Disposal statements are acceptable in accordance with 40 CFR 156.10 and PR Notice 83-3.

The label issues should be addressed during label review.

**CONCLUSIONS:**

The registrant has satisfied the product chemistry data requirements for the reregistration of EPA Reg. No. **7687-1**.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M STREET, S.W.**  
**WASHINGTON, D.C. 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information management Division (2137), U. S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**

Date August 6, 2009

EPA Reg. No./File Symbol 7687-1

Page 1 of 6

Applicant's/Registrant's Name &amp; Address

Hercules Chem Company, Inc.  
 111 South Street  
 Passaic, New Jersey 07055

Product

BreakThru R-D Root Destroyer

Ingredient Copper Sulfate Pentahydrate

Guideline Reference Number

Guideline Study Name

MRID Number

Submitter

Status

Note

Signature

Name and Title

Date

August 6, 2009

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Hercules Chem Company, Inc. 111 South Street Passaic, New Jersey 07055	EPA File Symbol/Registration Number 7687-1
	Product Name BreakThru R-D Root Destroyer
	Date of Confidential Statement of Formula (EPA Form 8570-4)

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Copper Sulfate Pentahydrate

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).




(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Copper Sulfate Pentahydrate		
*Product ingredient source information may be entitled to confidential treatment*		
Signature 	Name and Title ERASTUS R. MUCHNICK, COMPLIANCE MGR	Date 08/06/2009

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy

### **Paperwork Reduction Act Notice**

The public reporting burden for this collection of information is estimated to average 1.5 hours per response, including familiarization with the form, organizing the necessary information, and completing the form. Send any comments regarding the burden estimate or any other aspect of this collection of information to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.





Reg # 7687-1

CU SUIFATE 124401

8 0014

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
EPA Company No. 7687  
Hercules Chem Co. Inc.  
111 South Street  
Passaic, NJ 07055

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

x *Carol Wolf*

- ☐ Agent  
☐ Addressee

B. Received by (Printed Name)

*CAROL WOLF*

C. Date of Delivery

*1226*

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

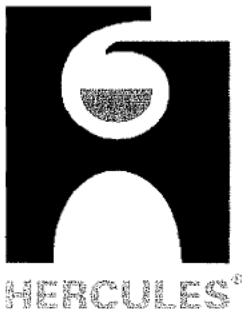
(Transfer from service label)

7006 0810 0000 0324 0627

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540



**Hercules Chemical  
Company Inc.**

111 South Street  
Passaic, New Jersey  
07055 9100

10/8/09  
Tel: 973 778 5000  
Fax: 973 777-1115  
www.hercchem.com

Document Processing Desk (DCI/SRRD)  
VERONICA DUTCH  
US EPA (7508P)  
1200 PENNSYLVANIA AVE., NW  
WASHINGTON, DC 20460

August 10, 2009

**\*Product ingredient source information may be entitled to  
confidential treatment\***

Dear Veronica,

I am submitting the information you requested for Breakthru R-D Root Destroyer  
including a letter from the manufacturer authorizing Hercules to use their data in  
response to US EPA DCI dated December 13, 2007.

Hercules claimed a 'generic data exemption' because we package [REDACTED]  
[REDACTED]

Sincerely,

  
Erastus Muchioki

Compliance & Safety Manager.

received  
8/18/09

PRB

66



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number EPA Est. No. 7687NJ01/7687-1	2. EPA Product Manager VERONICA DUTCH	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HERCULES BREAKTHRU R-D Root Destroyer	PM#	
5. Name and Address of Applicant (Include ZIP Code) HERCULES CHEMICAL COMPANY, INC. 111 SOUTH STREET PASSAIC, NJ 07055 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

THIS PRODUCT IS PACKAGED 100% AS RECEIVED.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-POUNDS	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2 POUNDS		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name ERASTUS R. MUCHIOKI		Title COMPLIANCE & SAFETY MGR.		Telephone No. (Include Area Code) 973-778-5000	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title COMPLIANCE & SAFETY MGR.			
4. Typed Name ERASTUS R. MUCHIOKI		5. Date 8-7-2009			

August 6, 2009.

DRAFT LABEL.

FRONT Primary Panel.

20602  
BREAKTHRU  
R-D  
Root Destroyer

Active Ingredient: Copper Sulfate, Pentahydrate-----99.0%  
Other Ingredients: -----1.0%  
Total:-----100.0%  
(Copper as metallic 25.0%)

DANGER

KEEP OUT OF REACH OF CHILDREN. READ ENTIRE LABEL BEFORE USING. SEE  
SIDE PANEL BEFORE FOR ADDITIONAL PRECAUTION STATEMENTS.

Prevents and clears Root-Blocked Sewer Lines. Effective Slow-Dissolving Crystals  
Net Wt. 2 lbs, (907 g)

SIDE PANELS.

Guarantee

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated  
when used according to directions, or purchase price will be refunded by Hercules upon  
presentation of guarantee coupon inside each container along with sales slip. No  
photocopies, please.

HERCULES BREAKTHRU R-D Root Destroyer

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687NJ01

TO OPEN, PRY OFF CAP WITH TOOL OR COIN

Hercules R-D Root Destroyer is a concentrated chemical compound formulated for root  
control. When used as prescribed in DIRECTIONS, its slow dissolving crystals release a  
chemical treatment which is absorbed by infiltrating roots. This kills the roots which  
decompose and wash away without injury to the main tree or shrub. The portion of the  
roots destroyed will not re-enter the sewer or the drain. Hercules R-D Root destroyer can  
also be used in lines leading to cesspools and septic tanks when used as directed.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER  
INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON  
INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE  
LABEL.

To clear partial stoppages: Use 2 to 4 pounds in a single application. Pour R-D into toilet  
bowl nearest sewer line ½ lb. at a time and flush for each ½ lb. to be sure all crystals are  
carried to sewer line or remove clean out plug and pour entire package directly into

sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS.

To clear complete stoppages: Some flow must be restored using a snake or sewer rod to enable dissolved R-D to travel to the root clogged portion of the sewer. Use 4 to 6 pounds at one time or 4 pounds for two consecutive weeks. In most cases, several days must be allowed for the infiltration roots to absorb the dissolved chemical, die, decay, and wash away.

To prevent root stoppages in house and building sewer connections: Use 2 pounds of R-D twice each year. Use same method as for partial stoppages. To avoid wasting R-D by flushing through a largely unobstructed sewer, apply it in the evening before retiring or during other low flow periods for best results.

In storms drains: Do not apply R-D during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above. Serious conditions may require larger, more frequent dosage.

#### PRECAUTIONARY STATEMENTS

##### Hazards to Humans and Domestic Animals

**DANGER:** Causes irreversible eye damage. Harmful if absorbed through the skin or inhaled. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin or on clothing. Wear protective eye wear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

##### FIRST AID:

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, and then continue rinsing. Call poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or a doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to unconscious person.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsions may be needed. Have the product container or label with you when calling a poison control center, doctor, or going for treatment. Hercules Toll Free No. 800-221-9330

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

**STORAGE AND DISPOSAL:** Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** If empty, do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by this label.

This product may not be sold or used in Connecticut or San Francisco Bay Area. Use Hercules Root Force instead.

Hercules Chemical Co., Inc., Passaic, NJ 07055. 1-800-221-9330 [www.herchem.com](http://www.herchem.com)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

JUL 21 2009

**CERTIFIED MAIL**

Hercules Chem Company, Inc.  
111 South Street  
Passaic, New Jersey 07055

Attn: Mr. Erastus Muchioki

**Subject:** Past Due 8-Month Response to the Copper Sulfate PDCI for EPA Reg.  
No. 7687-1.

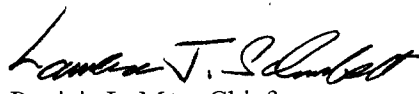
Dear Mr. Muchioki:

The 8-month response to the Copper Sulfate Product Data Call-In (PDCI) was due to the Agency on August 30, 2008, for the above product. As a result, this product is not in compliance with the Copper Sulfate PDCI. You are required to submit the 8-month response within 10 days of the receipt of this letter. The 8-month response should include the following information:

- Application for Reregistration (EPA Form 8570-1),
- Two copies of the Confidential Statement of Formula (EPA Form 8570-4),
- Five copies of draft label(s),
- Certification with Respect to Citation of Data (EPA Form 8570-34), and
- Data Matrix (EPA Form 8570-35)
- Required Product-specific Data

Failure to comply with this requirement by the specified due date, will result in a Notice of Intent to Suspend for the subject product. If you plan to voluntarily cancel this registration(s), please submit the request via e-mail to Veronica Dutch at [Dutch.Veronica@epa.gov](mailto:Dutch.Veronica@epa.gov) and, if appropriate, indicate that you choose to waive the 180-day comment period. If you have any questions regarding this letter, please contact Veronica Dutch at (703) 308-8585.

Sincerely,

*for* 

Patricia L. Moe, Chief  
Product Reregistration Branch  
Special Review and Reregistration Division

EPA Rec. No. 7687-1 Past Due 8 Month response to Copper Sulfate

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Erastus Muchioki  
Hercules Chem Company, Inc.  
111 South Street  
Passaic, New Jersey 07055

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X *Carol Wolf*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

CAROL WOLF

C. Date of Delivery

7/27/09

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number 7  
(Transfer from serv

7008 0150 0002 6185 4157

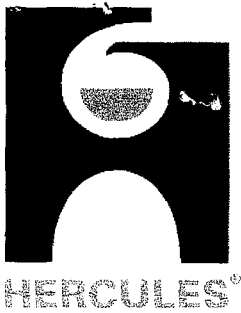
V. Dutch

7/21/09

United States Environmental Protection Agency Washington, D.C. 20460 <b>DATA CALL-IN RESPONSE</b>				OMB Approval 2070-0107 OMB Approval 2070-0057	
INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.					
1. Company Name and Address HERCULES CHEM CO INC 111 SOUTH STREET PASSAIC, NJ 07055		2. Case # and Name 0636 Copper Sulfate Chemical # and Name 024401 Copper sulfate pentahydrate		3. Date and Type of DCI and Number 14-Dec-2007 PRODUCT SPECIFIC ID # PDCI-024401-26856	
4. EPA Product Registration	5. I wish to cancel this product regis- tration volun- tarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA regis- tration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
7687-1		N.A.	N.A.	[REDACTED]	
<p> <i>logged</i>  <i>1/25/08</i>  <i>Hi Veronica -</i>  <i>I believe copper sulfate products</i>  <i>are assigned to you, so here you go!</i>    <i>Thanks,</i>  <i>-Rosanna</i> </p>					
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <i>Emelichki, Compliance &amp; Safety Mgr</i>				9. Date <i>1/16/08</i>	
10. Name of Company <i>HERCULES CHEMICAL CO. INC., EBASTUS MONTROSE</i>				11. Phone Number <i>973-778-3120 ext 319</i>	

**received**  
*1/24/08*  
*RL-3*





733-7687-1

**Hercules Chemical  
Company Inc.**

111 South Street  
Passaic, New Jersey  
07055 9100

Te: 973 778 5000  
Fax: 973 777 4115  
www.hercchem.com

#319

Document Processing Desk (DCI/SRRD)  
Veronica Dutch  
US EPA (7508P)  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

July 2, 2009

Dear Veronica,

I am submitting the enclosed letter from our Copper Sulfate supplier authorizing Hercules Chemical Company to cite their data in response to US EPA DCI dated December 13, 2007. In our response in January 22, 2008, we claimed a "generic data exemption". Also included is the product label for R-D Root Destroyer.

Sincerely,

*Erastus Muchioki*  
Erastus Muchioki  
Compliance & Safety Manager.

received  
7/9/09  
PLB



**BREAKTHRU™****20602****R-D  
Root Destroyer**

Active Ingredient: Copper Sulphate, Pentahydrate ..... 96.9%  
 Inert Ingredients: ..... 3.1%  
 Total: ..... 100.0%  
 (copper as metallic 24.6%)

**DANGER**  
 KEEP OUT OF REACH OF CHILDREN. READ ENTIRE LABEL BEFORE USING.  
 SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Net Wt. 2 lbs. (907 g)

*Prevents and Clears  
 Root-Blocked Sewer Lines  
 Effective Slow-  
 Dissolving Crystals*

Guarantee

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated when used according to directions, or purchase price will be refunded by Hercules upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.

**HERCULES R-D Root Destroyer**

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687NJ01

**TO OPEN: PRY OFF CAP WITH TOOL OR COIN.**

Hercules R-D Root Destroyer is a concentrated chemical compound formulated for root control. When used as prescribed in DIRECTIONS, its slow dissolving crystals release a chemical treatment which is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the main tree or shrub. The portion of roots destroyed will not re-enter the sewer or drain. Hercules Break-Thru R-D can be also used in lines leading to cesspools and septic tanks when used as directed.

**DIRECTIONS FOR USE**

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON PACKAGE INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL.**

**To clear partial stoppages:** Use 2 to 4 pounds in a single application. Pour R-D into toilet bowl nearest sewer line 1/2 lb. at a time and flush for each 1/2 lb. to be sure all crystals are carried to sewer line OR remove clean out plug and pour entire pkg. directly into sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS.

**To clear complete stoppages:** Some flow must be restored using a snake or sewer rod to enable dissolved R-D to travel to the root clogged portion of the sewer. Use 4 to 6 pounds at one time, or 4 pounds for two consecutive weeks. In most cases, several days must be allowed for the infiltrating roots to absorb the dissolved chemical, die, decay, and wash away. To prevent root stoppages in house and building sewer connections: Use 2 pounds of R-D twice each year. Use same method as for partial stoppages. To avoid wasting R-D by flushing through a largely unobstructed sewer, apply it in the evening before retiring or during other low flow periods for best results. In sewer mains: Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage.

**In storm drains:** Do not apply R-D during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above. Serious conditions may require larger, more frequent dosage.

**PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals**

**DANGER:** Causes irreversible eye damage. Harmful if absorbed through the skin or inhaled. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin or on clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**BREAKTHRU™**

20602

**FIRST AID:**

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing. Call poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucousal damage may contraindicate the use of gastric lavage. Measure against circulatory shock, respiratory depression and convulsions may be needed.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. Hercules Toll free no. 800-221-9339

**ENVIRONMENTAL HAZARD:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

**STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal.

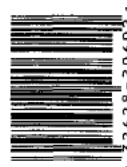
**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by this label.

This product may not be sold in Connecticut or San Francisco Bay Area.

Hercules Chemical Co., Inc. Passaic, N.J. 07055; 1-800-221-9339; www.hercchem.com

© 2005 HCD





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

April 19, 2007

Mr. Erastus Muchioki  
Hercules Chemical Company, Inc.  
111 South Street  
Passaic, NJ 07055

Subject: Notification for Alternate Brand Name  
R-D Root Destroyer  
EPA Reg. No. 7687-1  
Your Application Dated November 6, 2006

Dear Mr. Muchioki:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated November 6, 2006 for the products mentioned above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The labels submitted with the application have been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number EPA Est. No. 7687NJ01/7687-1	2. EPA Product Manager RAME CROMWELL	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Hercules Break Thru R-D Root Destroyer	PM#	
5. Name and Address of Applicant (Include ZIP Code) Hercules Chemical Company, Inc. 111 South Street Passaic, NJ 07055  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

**NOTIFICATION****Section - II**

APR 18 2007

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

"ALTERNATE PRODUCT NAME"

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Text No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2 pounds		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name ERASTUS MUCHIOKI	Title COMPLIANCE & SAFETY MGR	Telephone No. (Include Area Code) 973-778-5000 #319	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title COMPLIANCE & SAFETY MGR.		
4. Typed Name ERASTUS MUCHIOKI	5. Date 11/06/2006		

**77**



**Hercules Chemical  
Company Inc.**

111 South Street  
Passaic, New Jersey  
07055-9100

Tel: 973.778.5000  
Fax: 973.777.4115  
www.herchem.com

April 19, 2007

To Linda Arrington,

"Notification of (Alternate Brand Name for **Hercules R-D Root Destroyer**)  
per PR Notice 98-10"

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec.1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

Sincerely,

*Emuchioki*

Erastus Muchioki  
Compliance & Safety Manager  
Hercules Chemical Company, Inc.  
P: 973-778-5000 Ext. 319  
E-mail: emuchioki@herchem.com

# NOTIFICATION

APR 14 2007

20610



**BREAKTHRU™**

## R-D Root Destroyer

Active Ingredient: Copper Sulphate, Pentahydrate..... 96.9%  
Inert Ingredients:..... 3.1%  
Total:..... 100%  
(copper as metallic 24.6%)

### DANGER

KEEP OUT OF REACH OF CHILDREN.  
READ ENTIRE LABEL BEFORE  
USING. SEE SIDE PANEL FOR  
ADDITIONAL PRECAUTIONARY  
STATEMENTS.

*Prevents and Clears  
Root-Blocked Sewer Lines  
Effective Slow-  
Dissolving Crystals*

### Guarantee

Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated when used according to directions, or purchase price will be refunded by Hercules upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.



100 32628 20610 3

Net Wt. 50 Lbs. (22.7g)

### HERCULES R-D Root Destroyer

Read entire label before using.

E.P.A. Registration No. 7687-1

E.P.A. Est. No. 7687NJ01

**TO OPEN: PRY OFF CAP WITH TOOL OR COIN.**

**Hercules R-D Root Destroyer** is a concentrated chemical compound formulated for root control. When used as prescribed in DIRECTIONS, its slow dissolving crystals release a chemical treatment which is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the main tree or shrub. The portion of roots destroyed will not re-enter the sewer or drain. **Hercules R-D Root Destroyer** can also be used in lines leading to cesspools and septic tanks when used as directed.

#### DIRECTIONS FOR USE

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON PACKAGE INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL.**

**To clear partial stoppages:** Use 2 to 4 pounds in a single application. Pour **R-D** into toilet bowl nearest sewer line 1/2 lb. at a time and flush for each 1/2 lb. to be sure all crystals are carried to sewer line or remove clean out plug and pour entire package directly into sewer line. Flush into sewer with water. **NEVER POUR R-D INTO SINK OR TUB DRAINS.**

**To clear complete stoppages:** Some flow must be restored using a snake or sewer rod to enable dissolved **R-D** to travel to the root clogged portion of the sewer. Use 4 to 6 pounds at one time, or 4 pounds for two consecutive weeks. In most cases, several days must be allowed for the infiltrating roots to absorb the dissolved chemical, die, decay, and wash away.

**To prevent root stoppages in house and building sewer connections:** Use 2 pounds of **R-D** twice each year. Use same method as for partial stoppages. To avoid wasting **R-D** by flushing through a largely unobstructed sewer, apply it in the evening before retiring or during other low flow periods for best results.

**In sewer mains:** Sprinkle two pounds once a year into each junction and terminal manhole. Be careful not to obstruct free flow of sewage.

**In storms drains:** Do not apply **R-D** during periods of heavy storm flow. When dry, introduce controlled flow with a hose. Use same dose as in "sewer mains" above. Serious conditions may require larger, more frequent dosage.



0 32628 20610 6

### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

#### FIRST AID:

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, and then continue rinsing. Call poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have the person sip a glass of water - if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, and then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsions may be needed.

**Have the product container or label with you when calling a poison control center, doctor, or going for treatment. Hercules Toll Free No. 800-221-9330.**

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the labeling.

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by this label.

**This product may not be sold or used in Connecticut or San Francisco Bay Area. Use new Hercules Root Force™ instead.**

**Hercules Chemical Co., Inc.**

Passaic, N.J. 07055 • 1-800-221-9330

www.herchem.com

© 2006 HCCI

#3550



**BREATHRU™**

20602

**R-D  
Root Destroyer**

Active Ingredient: Copper Sulphate, Pentahydrate ..... 96.9%  
 Inert Ingredients: ..... 3.1%  
 Total: ..... 100.0%  
 (copper as metallic 24.6%)

**DANGER**  
 KEEP OUT OF REACH OF CHILDREN. READ ENTIRE LABEL BEFORE USING.  
 SEE SIDE PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS.

Net Wt. 2 lbs. (907 g)

*Prevents and Clears  
 Root-Blocked Sewer Lines  
 Effective Slow-  
 Dissolving Crystals*

**Guarantee**  
 Hercules Chemical Co., Inc. guarantees the purchaser that R-D will perform as stated when used according to directions, or purchase price will be refunded by Hercules upon presentation of guarantee coupon inside each container along with sales slip. No photocopies, please.

**HERCULES R-D Root Destroyer**

Read entire label before using.

E.P.A. Registration No. 7687-1 E.P.A. Est. No. 7687N101

**TO OPEN: PRY OFF CAP WITH TOOL OR COIN.**

Hercules R-D Root Destroyer is a concentrated chemical compound formulated for root control. When used as prescribed in DIRECTIONS, its slow dissolving crystals release a chemical treatment which is absorbed by infiltrating roots. This kills the roots which decompose and wash away without injury to the main tree or shrub. The portion of roots destroyed will not re-enter the sewer or drain. Hercules Break-Thru R-D can be also used in lines leading to cesspools and septic tanks when used as directed.

**DIRECTIONS FOR USE**

**IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING. BEFORE USING, READ DIRECTIONS ON PACKAGE INSERT ENCLOSED, AND ALL PRECAUTIONARY STATEMENTS ON PACKAGE LABEL.**  
**To clear partial stoppages:** Use 2 to 4 pounds in a single application. Pour R-D into toilet bowl nearest sewer line 1/2 lb. at a time and flush for each 1/2 lb. to be sure all crystals are carried to sewer line OR remove clean out plug and pour entire pkg. directly into sewer line. Flush into sewer with water. NEVER POUR R-D INTO SINK OR TUB DRAINS.  
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**PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals:**

**DANGER:** Causes irreversible eye damage. Harmful if absorbed through the skin or inhaled. Do not breathe dust. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Do not get in eyes, on skin or on clothing. Wear protective eyewear. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

**BREATHRU™**

20602

**FIRST AID**

**IF IN EYES:** Hold eyes open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing. Call poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person. **IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. Measure against circulatory shock, respiratory depression and convulsions may be needed.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. Hercules Toll free no. 800-221-9230

**ENVIRONMENTAL HAZARD:** This pesticide is toxic to fish and aquatic organisms. Do not apply directly to water except as specified on the label.

**STORAGE AND DISPOSAL**

Do not contaminate water, land or food by storage or disposal.

**PESTICIDE STORAGE:** Store in original container and keep in a locked storage area.

**PESTICIDE DISPOSAL:** If empty, do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid-waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain except as specified by this label.

This product may not be sold in Connecticut or San Francisco Bay Area.  
 Hercules Chemical Co., Inc. Passaic, N.J. 07055; 1-800-221-9230; www.hercchem.com  
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**NOTIFICATION****APR 19 2007**



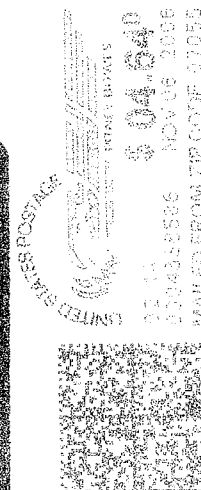
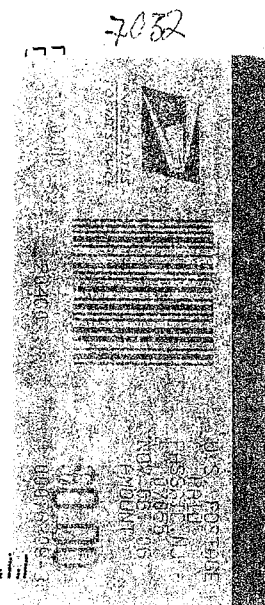
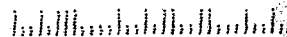


**Hercules Chemical  
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7505P  
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Environmental Protection Agency  
Washington, DC 20460

Att: RAME CROMWELL



Pages 82 - \*Confidential Statements of Formula may be entitled to confidential treatment\*